

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

TRACY D. LAMPKIN)	
)	
Plaintiff,)	CIVIL ACTION FILE
)	
v.)	NO: 1:06cv538-WKW
)	
UNITED PARCEL SERVICE)	
)	
)	
Defendant,)	

MOTION TO AMEND COMPLIANT

COMES NOW TRACY LAMPKIN (hereinafter “Ms. Lampkin), Plaintiff, by and through her undersigned counsel, and sets for her motion to amend her compliant for damages against the above-named United Parcel Service, a duly incorporated company within the State of Georgia as follows:

1.

Plaintiff’s initial compliant was filed pro se on June 16, 2006. Defendant United Parcel Service was served and an answer has been filed in this matter.

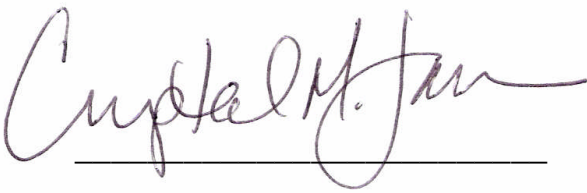
2.

Plaintiff has since this filing date obtained legal counsel and wishes to amend the initial compliant filed on June 16, 2006 pursuant to Fed. Rule Civ. P. 15(a) and seeks leave of the court to file his amended compliant.

3.

Plaintiff files this First Amended Complaint to further clarify and add new causes of action.

Respectfully submitted this 7th day of March 2007.

A handwritten signature in dark ink, appearing to read "Crystal M. James", is written over a horizontal line.

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Plaintiff,

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UNITED PARCEL SERVICE

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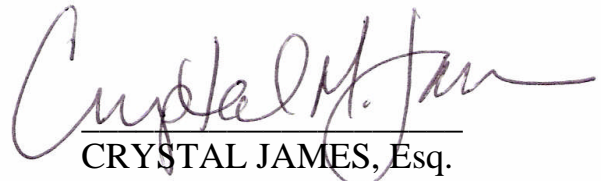
CERTIFICATE OF SERVICE

This is to certify that I have this 7th day of March served the Entry of Appearance with the Clerk of Court using the CM/ECF system which will automatically send e-mail notification of such filing to the following attorneys of record and to the following attorneys of record via U.S. Postal Service at the following addresses:

William J. Baxley
Donald R. James, Jr.
BAXLEY, DILLARD, DAUPHIN, MCKNIGHT & BARCLIFT
2008 Third Avenue South
Birmingham, AL 35233

(Signature on Following Page)

Submitted this 7th Day of March 2007.

A handwritten signature in dark ink, appearing to read "Crystal M. James", written over a horizontal line.

CRYSTAL JAMES, Esq.
Attorney for Plaintiff
Georgia Bar # 515292